

Rebecca Terry vs County of Milwaukee, et al.

17-CV-01112

Transcript of the Testimony of:

**JULIE K. SHANAHAN**

April 17, 2018

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**REPORTING**

1 IN THE UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF WISCONSIN  
3 REBECCA TERRY,  
4 Plaintiff,  
5 vs. Case No. 17-CV-01112  
6 COUNTY OF MILWAUKEE, et al.,  
7 Defendants.  
8  
910  
11  
12  
13 Deposition of JULIE K. SHANAHAN  
14 Tuesday, April 17th, 2018  
15 10:02 a.m.  
16 at  
17  
18 LEIB KNOTT GAYNOR  
19 219 North Milwaukee Street  
Milwaukee, Wisconsin  
20  
21  
22  
23  
24 Reported by Sandra K. Nelson  
25 Registered Professional Reporter

	Page 2	Page 4
1	Deposition of JULIE K. SHANAHAN, a	1
2	witness in the above-entitled action, taken at	2
3	the instance of the Plaintiff, pursuant to the	3
4	Federal Rules of Civil Procedure, pursuant to	4
5	Notice, before Sandra K. Nelson, RPR and Notary	5
6	Public, State of Wisconsin, at LEIB KNOTT GAYNOR,	6
7	219 North Milwaukee Street, Milwaukee, Wisconsin,	7
8	53202, on the 17th day of April, 2018 commencing	8
9	at 10:02 a.m. and concluding at 11:44 a.m.	9
10		
11		
12	A P P E A R A N C E S :	
13	LOVEY & LOVEY, by	
	Ms. Aisha Davis	
14	311 North Aberdeen Street, 3rd Floor	
	Chicago, Illinois 60607	
15	Appeared on behalf of Plaintiff;	
16	LEIB KNOTT GAYNOR LLC, by	
	Mr. Randy Arnold	
17	219 North Milwaukee Street, Suite 710	
	Milwaukee, Wisconsin 53202	
18	Appeared on behalf of County of	
	Milwaukee and David A. Clarke, Jr.,	
19	Officer Brian Wenzel, Jane and John	
	Doe, Unknown Employees of Milwaukee	
20	County Jail, Jane and John Doe,	
	Unknown Jail Supervisors;	
21		
22	HINSHAW & CULBERTSON LLP, by	
	Ms. Mollie T. Kugler	
23	100 East Wisconsin Avenue, Suite 2600	
	Milwaukee, Wisconsin 53202	
24	Appeared on behalf of Armor	
	Correctional Health Services.	
25		
	Page 3	Page 5
1	E X A M I N A T I O N	1
2	BY MS. DAVIS:	2
3		3
4		4
5		5
6		6
7		7
8		8
9		9
10	E X H I B I T S	10
11	EXHIBIT NO.	PAGE IDENTIFIED
12	Exh. 1 Detention Services, Bureau Logs,	19
	Records and Reports	
13	Exh. 2 Detention Services, Bureau Logs,	24
	Records and Reports	
14	Exh. 3 Jail log	47
	Exh. 4 Incident report	60
15		
16		
17		
18	(Original exhibits attached to original	
19	transcript. Copies of exhibits attached to	
20	copies of transcripts.)	
21		
22		
23		
24		
25		

			Page 6	Page 8	
1	Q	I did not know that acronym yet. Have you ever	1	Q	And before Lowe's, where did you work?
2		been a defendant in a case?	2	A	Home Depot. I've had -- you should have told me
3	A	No.	3		to bring my resume if you needed the whole thing.
4	Q	Leading up to today's deposition, did you review	4	Q	Just getting a little bit of background
5		any documents?	5		information that's all. For your job at Home
6	A	Just the one that I was provided.	6		Depot, how long did you work there?
7	Q	Was that the incident report?	7	A	Six months, something like that.
8	A	Yes.	8	Q	And that was back in '06?
9	Q	And you didn't look at anything else?	9	A	Probably or '05. I don't know.
10	A	No.	10	Q	Do you remember what you were doing before you
11	Q	Did you speak to anyone about the deposition?	11		worked at Home Depot?
12	A	No.	12	A	A variety of sales and marketing, merchandising,
13	Q	You're currently employed at the Milwaukee County	13		management jobs for wholesale growers.
14		Jail, right?	14	Q	And what's your highest level of education?
15	A	No, I am not. I no longer work there since	15	A	Bachelor's degree in communications.
16		February of this year.	16	Q	Where did you go?
17	Q	Where do you work now?	17	A	Carroll University.
18	A	I'm working for Delaware North Companies.	18	Q	Did you say Curry?
19		MR. ARNOLD: What was that?	19	A	Carroll.
20		THE WITNESS: Delaware North Companies.	20	Q	Carroll. Two Rs, two Ls?
21		MR. ARNOLD: Thank you.	21	A	Yes.
22	BY MS. DAVIS:		22	Q	What year did you graduate?
23	Q	So before leaving in February 2018, how long were	23	A	1981.
24		you working at the jail?	24	Q	Remind me again how long you worked at the
25	A	Eight years.	25		Milwaukee County Jail.
			Page 7	Page 9	
1	Q	And what was your highest rank?	1	A	Eight years.
2	A	Lieutenant.	2	Q	So that was about 2010 to 2018?
3	Q	In March of 2014, what was your rank?	3	A	Yes.
4	A	Correctional officer.	4	Q	Prior to being a CO at the Milwaukee County Jail,
5	Q	Before working at the jail, where did you work?	5		did you have any other law enforcement jobs?
6	A	Goodwill Industries in retail.	6	A	No.
7	Q	And how long did you work there?	7	Q	Did you apply to become a CO at the Milwaukee
8	A	Probably four months, because then I got hired by	8		County Jail?
9		Cook County.	9	A	Yes.
10	Q	Before the Goodwill Industries position, where	10	Q	Was it just an open application or did you hear
11		did you work?	11		about it from someone else?
12	A	Delaware North Company. And prior to that,	12	A	It was an open application.
13		Scott's Merchandise -- or Scott's Lawn Care --	13	Q	Did you apply only once?
14		not lawn care. Scott's Miracle Grow Company.	14	A	Yes.
15	Q	And before Scott's Miracle Grow, where did you	15	Q	Prior to working at the Milwaukee County Jail,
16		work?	16		did you have to undergo any training to become a
17	A	Lowe's.	17		CO?
18	Q	Lowe's. Okay. And about what time -- or about	18	A	Well, when I got hired, there was six weeks of
19		when did you work at Lowe's -- what year?	19		training.
20	A	2006/2007, something like that.	20	Q	There was no academy or anything like that, it
21	Q	And at Scott's Miracle Grow, was that about 2007	21		was just the six weeks of training?
22		as well?	22	A	It was the Sheriff's Training Academy.
23	A	2008.	23	Q	Was that specific for becoming a CO or was
24	Q	And the Delaware North Company?	24		that --
25	A	That was 2009 and 2010. That was part time.	25	A	Yes. And it's state mandated to be certified as

	Page 10	Page 12
1	a correctional officer.	1 thing.
2 Q	What types of training did you have in those six weeks?	2 Q Was there any subsequent training on how to address any medical or health issues after the six-week academy?
3		3
4 A	Everything and anything to do with being a correctional officer from learning communication skills, how to deal with mentally ill inmates, how to write reports, how to defend yourself if you got attacked by an inmate, laws, statutes, all that stuff.	4 MS. KUGLER: Objection; form.
5		5 THE WITNESS: I don't remember.
6		6
7		7 BY MS. DAVIS:
8		8 Q About how long was the training on health care at the academy?
9		9
10 Q	Was there any specific training for dealing with health care, whether it's mental health or --	10 A I don't remember.
11		11 Q Was there any training conducted on how to maintain jail logs while you were at the academy?
12	MS. KUGLER: Object to form.	12
13		13 A Yes.
14	THE WITNESS: There was a section on medical or mental health care. It was pretty generic because we're not medical people.	14 Q And was there any subsequent training on that?
15		15 A Once we got out of the academy?
16	BY MS. DAVIS:	16 Q Mm-hmm.
17 Q	For these trainings were you given any written paperwork to look over or was it all just for instruction?	17 A No.
18		18 Q Was there any specialized training for different positions that you could have as a CO within the jail?
19		19
20 A	There were stacks and stacks of paperwork that we got.	20 A Yes.
21		21 Q What were those trainings?
22 Q	Were there any tests --	22 A You could learn how to do fingerprinting and fingerprint identification, jail records, classification.
23 A	Absolutely.	23
24 Q	Was it a test for every subject area?	24
25 A	Yes.	25
	Page 11	Page 13
1 Q	So was there a test on writing reports?	1 Q Did you go for any of that specialized training?
2 A	I would assume so, but I don't remember for sure.	2 A Fingerprint identification.
3 Q	And were there tests for the health instructions you were given or training you were given?	3 Q Was that more so used for intakes at the jail?
4		4 A Yes.
5	MS. KUGLER: Objection; form.	5 Q Was that a one-time training?
6	THE WITNESS: Yes.	6 A Yes.
7	BY MS. DAVIS:	7 Q Did you have any other specialized training?
8 Q	And in the health training, was that more so in terms of how the COs interacted with the nursing staff and medical staff?	8 A Crisis intervention training. That was from the National -- National Alliance of Mental Health.
9		9
10		10 Q Is that a training that all the COs went to?
11	MS. KUGLER: Objection; form.	11 A No.
12	MS. DAVIS: I'll rephrase it.	12 Q How were you selected to go through it as opposed to others?
13	BY MS. DAVIS:	13
14 Q	When I say "medical" or any kind of training around medical or mental health, what do you understand that to mean?	14 A We had to put in a matter of stating that we were interested in doing it. I had worked on third shift with the special needs inmates, so it was kind of a natural step.
15		15
16		16
17 A	Well, the mental health is more how to communicate with people who have mental health issues.	17 Q And what would be considered third shift -- which hours?
18		18 A Ten o'clock to six a.m.
19		19
20 Q	Okay.	20 Q Were you working at the jail when Armor
21 A	The medical was more general things, but nothing specific about how to treat people.	21 Q Correctional Health began its contract with the
22		22 jail?
23	It was more how to respond to them or to pay attention if they were complaining about someone, who you called, that type of	23 A Yes.
24		24 Q When they started taking over the health care at
25		25

	Page 14	Page 16
1	the jail, was there any training for how to	1 that you talked about from the National Alliance
2	interact with the medical staff now that Armor	2 of Mental Health?
3	was in the jail?	3 A I don't remember.
4	MR. ARNOLD: Objection; form and	4 Q Do you know if it was before or after Armor
5	foundation.	5 started working with the jail?
6	THE WITNESS: No.	6 A My best guess would be it was before.
7	MS. KUGLER: Join.	7 Q And I'm still trying to remember the term that
8	BY MS. DAVIS:	8 you used for the prior testimony that you had in
9	Q So when they joined, did anything change in terms	9 court. It was the --
10	of your interactions in terms of the medical	10 A Intoximeter operator.
11	professionals?	11 Q I'm sorry?
12	A No.	12 A I'm an Intoximeter operator.
13	MR. ARNOLD: You need to wait until she	13 Q I meant where you said there was a death in the
14	finishes the question. It's very hard for the	14 jail.
15	court reporter. It's hard to do. We do it in	15 A It was an inquest. My involvement was, "Were you
16	conversation all the time.	16 there that day?"
17	BY MS. DAVIS:	17 "Yes."
18	Q When Armor did come into the jail, was there any	18 "Did you know anything?"
19	change in the medical staff that you noticed?	19 "No."
20	MS. KUGLER: Objection; form.	20 Q Was that a death that happened while Armor was
21	THE WITNESS: That really wasn't my	21 working at the jail?
22	area or my concern really because I was just an	22 A Yes.
23	officer. And even as a lieutenant, we didn't get	23 Q Do you remember who the inmate was that died?
24	involved in staffing.	24 A Terrill Thomas.
25		25 Q Were you there the day that he died?
	Page 15	Page 17
1	BY MS. DAVIS:	1 A Not that I remember.
2	Q So when you started working at the jail, you were	2 Q And you said that was about two years ago. So in
3	a CO. How long were you a CO?	3 2016?
4	A 2014. I was promoted later.	4 A I think so.
5	Q And is it directly from being a CO to a	5 Q Do you know where in the jail he died?
6	lieutenant?	6 A In the cell. In the disciplinary housing unit.
7	A Yes, that's the next step.	7 Q As a CO, were there specific areas of the jail
8	Q Are there any other steps between or...	8 that you worked in or could you work in any part
9	A No.	9 of the jail?
10	Q Are there any steps after lieutenant?	10 A Everyone was given an assignment every day they
11	A Captain.	11 worked and it varied.
12	Q When you became a lieutenant, was there any other	12 Q Okay. Did you ever work in the SMU?
13	training that you had to go through?	13 A Occasionally.
14	A Nothing formal.	14 Q Was there any additional training that you needed
15	Q What were the informal trainings?	15 to go through to work in the SMU?
16	A Working with another lieutenant to learn the	16 A No.
17	duties and responsibilities.	17 Q Did you interact with medical staff more in the
18	Q What were the new duties that you had?	18 SMU as opposed to other areas of the jail?
19	A Just talking about supervising employees and	19 A Yes.
20	reviewing their jail logs, that type of thing,	20 Q Did you only ever work the third shift while you
21	but nothing -- there wasn't much change.	21 were at the jail?
22	It was just more being directly	22 MS. KUGLER: Objection; form.
23	involved in the day-to-day supervising the	23 THE WITNESS: No.
24	officers.	24 BY MS. DAVIS:
25	Q When did you attend the mental health training	25 Q Was it a rotating schedule?

Page 18			Page 20
1 A No.		1	MS. KUGLER: Objection; form.
2 Q Okay. What other -- sorry. I'm just not really	familiar about how the schedules are set.	2	THE WITNESS: I don't remember.
3		3	BY MS. DAVIS:
4 So how did that happen? What was	the process of setting your schedule while you	4 Q	And you said you had access to this document if
5 were a CO?	were a CO?	5	you ever wanted to see the revised version?
6 A When I first started? We were given the option	of selecting a shift we wanted to work, and then	6 A	Yes.
7 after that, it was based on staffing needs when	people got moved around.	7 Q	During the academy, were you trained on
8		8	maintaining logs, records, and reports?
9		9 A	Yes.
10		10 Q	Was that -- strike that.
11 Q You mentioned that you received some training on	records and record keeping while you were at the	11	Were those logs, records and
12 academy, right?	academy, right?	12	reports something that you had to have approved
13		13	by a supervisor or just something that was
14 A Limited. I was not a records officer.		14	routine that didn't have to be approved?
15 Q Is that a specialized position?		15	MR. ARNOLD: Object to form and
16 A Absolutely.		16	foundation.
17 MS. DAVIS: I'm going to have this	marked.	17	MS. KUGLER: Join.
18		18	THE WITNESS: At the academy or
19 (Exhibit 1 was marked for	identification.)	19	during --
20		20	MS. DAVIS: During your time as a CO.
21 BY MS. DAVIS:		21	THE WITNESS: Jail logs, no. If you
22 Q I'm handing you what's been marked as Exhibit 1.	I'll give you a little bit of time to look	22	had to write an incident report, yes. You
23 through it if you want to.		23	submitted it to your direct supervisor,
24		24	lieutenant, and they approved it or sent it back
25 A (Witness reviewing document.)		25	and said fix it.
Page 19			Page 21
1 Q Have you ever seen this document before?		1	BY MS. DAVIS:
2 A Yes.		2	Okay. So I'm looking at the bottom of the first
3 Q Was there any training that you had on this	Detention Services, Bureau Logs, Records and	3	page, which is five at the bottom.
4 Reports?		4	The log entries, was there ever --
5 A It would have been in the initial training at the	academy, and then we had access to anything we	5	we'll just talk about log entries. Was there
6 wanted to look up if needed.		6	ever any review process to make sure they were
7		7	done correctly?
8 Q Is this an area -- I'm sorry. Strike that.		8	MR. ARNOLD: At any time?
9		9	MS. DAVIS: While you were a CO.
10 Is this something that you would	have been tested on in the academy?	10	THE WITNESS: Lieutenants were supposed
11		11	to check the logs, to review them to make sure
12 MR. ARNOLD: I'm going to object to the	question.	12	that they were putting everything in that needed
13		13	to be entered in.
14 It's obvious from the document	that she couldn't have received it during her	14	BY MS. DAVIS:
15 training because it was revised in October of	2014, which was well after the training so...	15	Okay. And when you were a lieutenant, did you
16		16	have to review CO logs?
17		17 A	Yes.
18 THE WITNESS: I don't know.		18 Q	Was that done daily?
19 BY MS. DAVIS:		19 A	Yes.
20 Q Was there ever a test on record keeping or	reporting when you were at the academy?	20 Q	And then turning to page seven, you mentioned
21		21	that there are incident reports that are written
22 A I don't remember.		22	up and have to be reviewed by lieutenants, right?
23 Q Did you receive some version of this document,	whether it was the original or the revised, do	23 A	Correct.
24	you remember?	24 Q	When are those incident reports written?
25		25 A	If there's a medical emergency, if there's a

Page 22		Page 24
1	fight, if there's use of force. But that was	1 THE WITNESS: Yes.
2	much more involved with the report.	2 BY MS. DAVIS:
3	I'm trying to think of what else.	3 Q I take that back. You had medical training in
4	I mean, other people, if they were transporting	4 the academy, and you said you went to the crisis
5	people to -- or providing security on a hospital	5 intervention training?
6	run, they wrote a short report saying that they	6 A Correct.
7	went to the hospital with so and so and watched	7 Q Outside of those two instances, was there any
8	over the person.	8 other medical training you received?
9	Chapter 51 reports were a	9 A We had to have annual CPR recertification.
10	different thing that the deputies had to take	10 Q And where did you go for that recertification?
11	care of because that was a legal document.	11 A It was usually -- well, it was held at the jail
12	Q Okay. And when a report had to be written, how	12 or at the academy.
13	did you determine what CO would write the report?	13 Q So that was put on by the sheriff's office?
14	A Whoever was the CO assigned to that post or was	14 A Correct.
15	the first responder or however -- whatever the	15 Q You said there was no special training to work in
16	incident was.	16 the special medical unit, correct?
17	Q Okay. And is it just the CO who wrote the report	17 A Correct.
18	and the lieutenant who reviewed the report?	18 MS. DAVIS: Can I have this marked as
19	A For a general one, yes. Sometimes if it was	19 Exhibit 2, please.
20	quite involved, like a use of force, they would	20 (Exhibit 2 was marked for
21	get the captains involved.	21 identification.)
22	But for this type of thing, no, it	22 BY MS. DAVIS:
23	would just have been the lieutenant.	23 Q I'm handing you what's been marked as Exhibit 2
24	Q And when you say "this type of thing," you mean	24 I'll give you a second to look that over.
25	the incident report related to this case?	25 A (Witness reviewing document.)
Page 23		Page 25
1	A Yes.	1 Q Have you seen this document before?
2	MR. ARNOLD: You really need to try and	2 A A version of it.
3	not talk over each other.	3 Q Okay. When would you have seen a version of this
4	THE WITNESS: Okay.	4 document?
5	BY MS. DAVIS:	5 A Probably in training.
6	Q So when you say "this type of report," you're	6 Q So that would have been in 2010?
7	talking about the incident report that was	7 A Mm-hmm. Yes.
8	written for Rebecca Terry?	8 Q And to the best of your recollection, were you
9	A Correct.	9 trained on how to maintain the work station at
10	Q Was there a specific type of training for logs,	10 the SMU?
11	records or reports related to security programs?	11 A Well, the work station -- it was the same no
12	MS. KUGLER: Objection; form.	12 matter what area you were working in.
13	THE WITNESS: Explain security.	13 Q So there was no difference between the training
14	BY MS. DAVIS:	14 for the work station at the SMU or any other post
15	Q If we look at the first page again, there's a	15 in the jail?
16	section on security. Was there any separate	16 A Correct.
17	training on logs, records or reports related to	17 Q Were you ever trained on maintaining the jail
18	security?	18 logs specifically for the SMU?
19	A Not that I recall.	19 A Not that I recall.
20	Q And how often -- nevermind. Scratch that.	20 Q Were you ever trained on the use of telephones in
21	You said that the only medical	21 the SMU?
22	training that you had was in the academy,	22 A It was the same as any housing unit.
23	correct?	23 Q Was the use of radios the same in other housing
24	MS. KUGLER: Objection; form, misstates	24 units as well?
25	prior testimony.	25 A Yes.

	Page 26	Page 28
1	Q And the use of televisions?	1 was medical and that involves HIPAA.
2	A Yes.	2 BY MS. DAVIS:
3	Q And monitoring the alarms and security systems?	3 Q To the best of your understanding, why would an
4	A Yes.	4 inmate be in the SMU?
5	Q Would the training on emergency situations in the	5 MR. ARNOLD: Objection; foundation.
6	SMU have been the same as in other housing units?	6 MS. KUGLER: Join.
7	A Yes.	7 THE WITNESS: That was not my call of
8	Q Is there a difference in pod access and cell	8 why they were there or not there.
9	access between housing units?	9 BY MS. DAVIS:
10	A No.	10 Q So when you were working in the SMU, did you have
11	Q Is there a difference in terms of maintenance and	11 any idea why an inmate would be in the SMU as
12	sanitation for the SMU as opposed to other	12 opposed to another housing unit?
13	housing units?	13 A No, because the confidentiality of medical
14	A Yes.	14 issues.
15	Q What's the difference?	15 Q So were people who were healthy placed in the
16	A If I recall correctly, more scheduled biohazard	16 SMU?
17	and pickups just because of the nature of the	17 MR. ARNOLD: Objection; foundation.
18	area.	18 THE WITNESS: That -- I don't have the
19	Q Is that something you did as a CO or were there	19 training to determine if they were healthy or
20	other people who would handle that?	20 not.
21	A There were inmate workers who were trained in	21 BY MS. DAVIS:
22	biohazard cleaning.	22 Q So even though it's called a special medical
23	Q And they were supervised by other COs?	23 unit, you're not sure why someone would be housed
24	A Correct.	24 in the SMU as opposed to another housing unit?
25	Q Do you recall at all how often that would happen,	25 MR. ARNOLD: Objection; asked and
	Page 27	Page 29
1	when the inmate worker would come in and clean?	1 answered.
2	A I recall multiple times a day and based on need.	2 MS. KUGLER: Join.
3	Q Is there any difference in the admission to the	3 THE WITNESS: I mean, that's -- medical
4	pods in the SMU as opposed to the cells in other	4 makes the determination who gets housed in the
5	housing units?	5 SMU versus general housing.
6	A Admission in what sense?	6 BY MS. DAVIS:
7	Q In terms of entering the pod versus going into a	7 Q If an inmate in general housing had a medical
8	cell.	8 issue, where would they go?
9	A No.	9 MR. ARNOLD: Objection; foundation. If
10	Q Was there any difference in food service at the	10 you know.
11	SMU as opposed to other housing units?	11 THE WITNESS: They would have to
12	A Yes, because many of them were on special diets.	12 either -- talk to the officer directly for a
13	That was about the only difference.	13 medical request slip. Occasionally there were
14	Q Is there any difference in the way that inmates	14 follow-ups based on when they came into the
15	corresponded with the CO in the SMU than the	15 booking room.
16	other housing units?	16 If they had some type of chronic
17	A No.	17 issue or whatever, they could -- they would be
18	MR. ARNOLD: Objection; form.	18 seen as a followup if there were medications
19	BY MS. DAVIS:	19 involved or the hangnail, you know, needed
20	Q And because -- well --	20 further treatment. But that's all medical.
21	Were all the people who were	21 BY MS. DAVIS:
22	housed in the SMU because of medical needs?	22 Q Okay. Were there inmates in general housing
23	MR. ARNOLD: Objection; foundation.	23 while you were working there?
24	MS. KUGLER: Join.	24 Did you know of any inmates
25	THE WITNESS: That I don't know. That	25 transferred from general housing to the SMU

	Page 30	Page 32
1	because of a medical need, whether you knew what	1 medical situation.
2	the medical need was or not?	2 BY MS. DAVIS:
3	MS. KUGLER: Objection; form.	3 Q Okay. So as a CO, were you ever trained to
4	THE WITNESS: I don't remember.	4 provide any kind of medical care to the inmates?
5	BY MS. DAVIS:	5 A No.
6	Q Do you recall about how many pods are in the SMU?	6 Q Were you trained to alert medical staff of
7	A How many cells?	7 medical needs for inmates?
8	Q Cells. Well, I've seen it listed as pods. Are	8 A Yes.
9	they considered the same as a cell?	9 Q Was there a particular staff person that you were
10	A They refer to pods as housing units, so you could	10 supposed to contact?
11	say the SMU is a pod; but there are 11 cells in	11 A One of the medical people.
12	the SMU, 11 individual cells for 11 individual	12 Q But no medical person specifically, just any
13	people.	13 medical person?
14	Q How many cells were in the other housing pods?	14 MS. KUGLER: Objection; form.
15	A It varied. Some were 64, some were 48. It	15 THE WITNESS: Well, I mean, it depends
16	depended on which housing. Some were set up	16 on the medical situation. If they're complaining
17	differently than others.	17 of a headache, they fill out a medical request
18	Q So on page 46 of this document, at IM 8.1 -- IM	18 form to see one of the providers, and that's up
19	8.1.8 when it says, "Inmate admission to pod,"	19 to the medical staff when they're going to see
20	does that mean the SMU is a pod or a cell?	20 the person for their headache.
21	MR. ARNOLD: Objection; foundation. If	21 If it's something where they're
22	you know.	22 doubled over in pain, then it would be a medical
23	THE WITNESS: Just to the pod.	23 emergency that you would call over the radio and
24	BY MS. DAVIS:	24 say, "I have a medical emergency. Inmate
25	Q So that would be the SMU?	25 complaining of severe stomach pain." That's an
	Page 31	Page 33
1	A Correct.	1 example.
2	Q Okay. Is there a reason why someone would call	2 BY MS. DAVIS:
3	the cells in the SMU a pod as opposed to a cell?	3 Q And would you then escort the person who is
4	MS. KUGLER: Objection; foundation.	4 having the medical emergency over --
5	MR. ARNOLD: Join.	5 A No. They -- the medical staff and additional
6	BY MS. DAVIS:	6 officers would respond to wherever the inmate
7	Q To your knowledge, is there any reason why	7 was, if it was a doubled-over-in-pain situation.
8	someone would call the cell a pod as opposed	8 Q Were you ever a CO who responded with medical
9	to --	9 staff for a medical emergency?
10	A No.	10 A Multiple times.
11	Q Going back to our discussion of any medical	11 Q When you responded with medical staff, what was
12	training that you ever had for the CO position,	12 your role as the CO?
13	when an inmate complained of a medical need, what	13 A To provide security and also to assist if they
14	were you trained to do in response?	14 needed the oxygen bag carried in or if --
15	MS. KUGLER: Objection; form.	15 basically, just to stand by until told if they
16	THE WITNESS: It depended on the	16 needed us to help escort the inmate to the clinic
17	medical issue.	17 or whatever. It varied.
18	BY MS. DAVIS:	18 Q Okay. And what's the difference between the
19	Q Okay. So if an inmate came to you requesting	19 clinic and the SMU?
20	immediate medical care or some kind of health	20 A The clinic is like a medical clinic you and I
21	care, what were you trained to do as a CO?	21 would go to for -- to see a provider. They had
22	MR. ARNOLD: Object to the form of the	22 doctors, they had advanced practice nurses,
23	question; it's multiple.	23 dentists that came once a week or something.
24	MS. KUGLER: Join.	24 So those were appointments in the
25	THE WITNESS: It depended on the	25 clinic.

	Page 34	Page 36
1	Q Okay. Well, was it just appointments or	1 times over my career.
2	appointments and medical emergencies?	2 BY MS. DAVIS:
3	MS. KUGLER: Objection; form.	3 Q Okay. So the few times that you were there, you
4	THE WITNESS: It depended. That was	4 don't recall whether you were given any
5	medical, depending if they want to take them to	5 instructions about an inmate's medical needs
6	the clinic for further evaluation or if they	6 while housed at the SMU?
7	could determine at the scene that the person	7 A I don't recall anything specific, no.
8	could stay in the housing unit.	8 Q When you reported for a shift at the SMU, was
9	BY MS. DAVIS:	9 there any conversation that had to happen with a
10	Q The numbers are kind of blurry, but I think that	10 lieutenant or the CO who was on duty before?
11	this is page 49 or 47. I can't tell, but the one	11 A The CO before would debrief and say, you know, if
12	that's marked Terry 0190179.	12 there was anything going on or someone was being
13	A Mm-hmm.	13 monitored or whatever.
14	Q In Section IM 8.1.12, it discusses inmate health	14 Q Under IM 8.1.14 where it says "Lock-up," the same
15	care. Do you see that?	15 page as the inmate health care where it says,
16	A Mm-hmm.	16 "Conduct a formal count/wristband check," was
17	Q Was there any training that you remember prior to	17 that a check that you had to do regularly during
18	being stationed in the SMU based around inmate	18 your shift?
19	health care?	19 A Yes, at the start and at the end of the shift.
20	MS. KUGLER: Objection; form.	20 Q Were there any checks that you had to do
21	THE WITNESS: Not that I recall.	21 throughout the shift, or was there -- I'm sorry.
22	BY MS. DAVIS:	Were there any checks that you had
23	Q So there was no additional health care training	23 to do throughout your shift?
24	for COs working in the SMU?	24 A Well, 30-minute observation rounds.
25	MR. ARNOLD: Asked and answered.	25 Q And during those 30-minute observation rounds,
	Page 35	Page 37
1	THE WITNESS: Not that I recall.	1 what did you have to do?
2	BY MS. DAVIS:	2 A Check to make sure that they were all right, even
3	Q Were there more health care -- strike that.	3 if it meant turning on the light or shining a
4	As a CO in the SMU, were you	4 flashlight in their eyes.
5	responsible for monitoring the inmate's health	5 Q Was there any count or wristband check during
6	care needs?	6 those 30-minute intervals?
7	A Well, with any housing unit, if someone had	7 A No.
8	health care needs, we would monitor it.	8 Q And when you say that you checked to see if they
9	In the SMU, the few times I worked	9 were all right, what do you mean?
10	in there, the nurses were in there much more	10 A Well, you want to make sure they're breathing,
11	often than the regular housing unit, and they	11 make sure they're alive. So that would fall
12	would tell us if so and so -- you know, to keep	12 under the all right.
13	an eye on his dressing because it's changed every	13 Q Does that mean you would go in and check on
14	couple hours.	14 someone if it looked like they weren't breathing?
15	But, "If you notice something, let	15 MR. ARNOLD: Object to the form.
16	us know." That's kind of how it went.	16 MS. KUGLER: Join.
17	Q So when you had reported for your shift at the	17 THE WITNESS: I would not go in by
18	SMU, would the nurses talk to you about the	18 myself -- absolutely not -- for security
19	different needs of the inmates that were in	19 purposes, because you don't know if they're
20	there?	20 pretending or not and would attack you.
21	MR. ARNOLD: Objection; form and	21 BY MS. DAVIS:
22	foundation.	22 Q How did you determine if someone was all right?
23	MS. KUGLER: Join.	23 A If you couldn't get a response on them by
24	THE WITNESS: Not always. I mean, I	24 knocking on the door and calling their name, then
25	only worked there -- literally in there a few	25 you call a medical emergency for an unresponsive

			Page 38	Page 40
1	inmate.			
2	Q	So if they didn't respond because they were, for example asleep, would you then check on them again or call in the medical person?		1 A Everyone has to go to the academy. Or back when I started, they did.
3				2 Q And at the academy, was there any specific training on being stationed in the SMU?
4				3 A I don't know.
5		MR. ARNOLD: Objection; form and foundation.		4 Q So there was no additional training provided to you while you were working in the SMU with people who might have medical emergencies?
6				5 A MR. ARNOLD: Object to the form of the question.
7		MS. KUGLER: Join.		6 Q MS. KUGLER: Join.
8		THE WITNESS: If they were asleep, I would be waking them up if I couldn't tell they were alive, so to speak.		7 Q THE WITNESS: Not to my knowledge.
9				8 A BY MS. DAVIS:
10				9 Q During those 30-minute checks, about how long did it take you to observe the 11 cells in the SMU?
11	BY MS. DAVIS:			10 A MR. ARNOLD: Assuming they're all full?
12	Q	And I'm asking because you said that you worked third shift.		11 A MS. DAVIS: Sure, assuming they're all full.
13				12 Q THE WITNESS: Five to seven minutes,
14		And if these are every 30 minutes, I'm just trying to understand if someone was asleep, if that was a cause for concern?		13 A because it's a small place. It's probably a little bigger than this conference room.
15				14 A BY MS. DAVIS:
16				15 Q And if all of the cells weren't full, would it take you much less time to do your 30-minute interval checks?
17	A	Right.		
18	Q	During the 30-minute checks, if someone was -- seemed like they were not all right like you had mentioned, you would always call the medical staff?		
19				
20				
21				
22	A	If I could not observe a person breathing or if they appeared to be labored breathing or whatever you want to call it, yes, I would have called a medical emergency.		
23				
24				
25				
			Page 39	Page 41
1	Q	And how did you base your determination if someone was all right? Like what did you base that on if you had no training?		1 A It depends. I mean, it depended on the date -- the number of people, the type of people that were in there. There's no set time of how long it takes.
2				2 Q That's fair. And the few times that you were stationed in the SMU, do your checks take longer than seven minutes?
3				3 A 5 Q MS. KUGLER: Objection; form.
4		MS. KUGLER: Objection; form.		4 A THE WITNESS: I don't recall.
5		MR. ARNOLD: Join.		5 A 6 Q BY MS. DAVIS:
6		THE WITNESS: It was based on observation.		7 A 12 Q To the best of your recollection, did any of your checks take less than five minutes?
7				8 A 13 Q MR. ARNOLD: If you remember.
8	BY MS. DAVIS:			9 A 14 Q THE WITNESS: I can't remember.
9	Q	Were you trained on what to look for in order to determine if there was a medical emergency at the SMU?		10 A 15 Q BY MS. DAVIS:
10				11 A 16 Q To the best of your recollection, did any of your checks take less than three minutes?
11				12 A 17 Q MR. ARNOLD: I don't understand your question.
12	A	Not specifically, but I mean, as a reasonable human being, I can tell if someone is sleeping versus not breathing correctly or whatever.		13 A 18 Q THE WITNESS: Okay. When you did the 30-minute interval checks, did you log those checks?
13				14 A 19 Q Yes.
14				15 A 20 Q Training in -- from the academy?
15	Q	So you'd base your determination if someone was all right on just being reasonable?		16 A 21 Q
16				17 A 22 Q
17		MS. KUGLER: Objection; form, misstates prior testimony.		18 A 23 Q
18				19 A 24 Q
19				20 A 25 Q
20		MR. ARNOLD: Join.		
21		THE WITNESS: That's me personally.		
22	BY MS. DAVIS:			
23	Q	Do you know of any other COs who went through training to work in the SMU?		
24	A	Training in -- from the academy?		
25	Q	Yeah.		

		Page 42	Page 44
1	Q	And when your lieutenant reviewed that log, was there ever -- scratch that.	1 BY MS. DAVIS:
2		If a lieutenant reviewed a log where the 30-minute checks weren't all done properly, what, if anything, would happen?	2 Q I'm sorry. So when you would log those checks in in the 30-minute intervals, did you start a timer or something to know when you began the check?
3		MS. KUGLER: Objection; form.	3 A No.
4		THE WITNESS: Speculating, the lieutenant should have said something to whoever the officer was.	4 Q Okay.
5		BY MS. DAVIS:	5 A I -- sometimes I would type in, "Started inspection, completed inspection, nothing observed."
6	Q	So if you -- scratch that.	6 Q In that small of a unit, I highly doubt that people would do that because it would take longer to do that than to actually do your inspection. But not in -- not in a small unit like that. It was usually just completed.
7		When you were a lieutenant, did you check logs?	7 Q Okay. So in the larger housing units, where you said that there were 48 or 64 cells, right?
8	A	Yes.	8 A Right.
9	Q	If you noticed that a CO did not complete all the checks that they were supposed to do, what did you do?	9 Q When you did your checks -- when you did the rounds every 30 minutes, how did you log that?
10	A	I spoke with them and I would also usually make a notation in there that I reviewed the log and that such and such was missing, and then I would tell the officer to make sure that they properly do their jail log.	10 A Personally?
11	Q	When you reviewed the jail log, did you ever look at how long these checks took?	11 Q Mm-hmm.
12		MR. ARNOLD: This is in any housing	12 A Would have logged start, then done the inspection, and then completed the inspection.
13		unit?	13 Q Okay. And in the few times -- if you remember, the few times you were in the SMU, did you log
		Page 43	Page 45
1		MS. DAVIS: Any housing unit.	1 Q start, do the inspection, and then --
2		THE WITNESS: Yes.	2 A I don't recall.
3		BY MS. DAVIS:	3 Q Were you trained to log inspections that way?
4	Q	Why?	4 A MS. KUGLER: Objection.
5	A	Why?	5 A MR. ARNOLD: Objection; form and foundation.
6	Q	Yes.	6 A MS. KUGLER: Join.
7	A	Because they're required to perform regularly-scheduled inspections of all the inmates in the cells.	7 A THE WITNESS: I don't remember.
8	Q	And if you noticed that a check happened in less than a minute in the SMU, would that be something that would stand out to you?	8 Q BY MS. DAVIS:
9		MS. KUGLER: Object to form.	9 Q I'll rephrase it. Would keeping the jail logs --
10		MR. ARNOLD: And foundation.	10 A you said you had training on keeping jail logs, correct?
11		THE WITNESS: In theory, yes.	11 A Yes.
12		BY MS. DAVIS:	12 Q Okay. And during that training, were you instructed on how to either start or stop the timer or clock, or whatever it is that you all click to do the inspections?
13	Q	Okay. When you were a CO, in the few times you worked in the SMU, did you ever complete your check in less than a minute?	13 A MR. ARNOLD: Objection; form, foundation. If you understand, go ahead.
14		MR. ARNOLD: Objection; foundation.	14 A MS. KUGLER: Join.
15		THE WITNESS: I don't recall, but highly unlikely because it takes me 30 seconds to get out of the chair and walk to the door.	15 A THE WITNESS: We were given -- I mean, when you -- when you first came out of the academy, you started and you partnered with officers that were already working there in the trade.
16			16 A
17			17 A
18			18 A
19			19 A
20			20 A
21			21 A
22			22 A
23			23 A
24			24 A
25			25 A

	Page 46		Page 48
1	They were the ones that -- you	1	A Yeah.
2	know, "Here's the jail log" and helped us get	2	Q And is that your name in the log text?
3	going.	3	A Yes.
4	BY MS. DAVIS:	4	Q Was this entry in response to the occurrence two
5	Q Okay.	5	rows up?
6	A Because --	6	MS. KUGLER: Objection; form.
7	Q Sorry.	7	MR. ARNOLD: If you know.
8	MR. ARNOLD: Finish your answer.	8	THE WITNESS: I would assume so.
9	THE WITNESS: I mean, it was just to	9	BY MS. DAVIS:
10	help us make sure we had everything included.	10	Q Had you ever been called to respond to an inmate
11	Because when you start as an	11	suicide attempt while you worked at the jail?
12	officer, you're a little overwhelmed by all the	12	A Yes.
13	things you needed to do. So...	13	Q Can you -- do you recall how many times that
14	BY MS. DAVIS:	14	happened?
15	Q Okay. So after the academy, when you first	15	A I don't remember.
16	start, there's a little bit of informal training	16	Q Was it something that happened more than five
17	that happens between COs?	17	times?
18	A Yes.	18	A I don't remember.
19	MR. ARNOLD: Try to let her finish her	19	Q If an inmate attempted suicide, would there be an
20	question.	20	incident report written?
21	THE WITNESS: Okay.	21	MR. ARNOLD: Objection; foundation.
22	BY MS. DAVIS:	22	MS. KUGLER: Join.
23	Q I finished. I didn't know --	23	BY MS. DAVIS:
24	A Yes.	24	Q Do you know if an incident report would be
25	Q So you were taught by another CO how to log these	25	generated for an inmate suicide attempt?
	Page 47		Page 49
1	checks?	1	A It should be.
2	A Correct.	2	Q Do you know if there was one written for this
3	Q Was there any difference in logging the 30-minute	3	attempted suicide on --
4	checks between the SMU and other housing units?	4	A I don't recall.
5	MR. ARNOLD: Other than what she's	5	Q Okay. Do you remember being called down to the
6	already testified to?	6	SMU for -- I'm sorry. Let me take a step back.
7	THE WITNESS: No.	7	What housing unit did this happen
8	(Exhibit 3 was marked for	8	in? Can you tell from this document?
9	identification.)	9	A Housing Unit 4B.
10	BY MS. DAVIS:	10	Q 4B. Is that the SMU or another housing unit?
11	Q I'm going to hand you what's been marked as	11	A That's another housing unit.
12	Exhibit 3. Do you recognize what kind of	12	Q Okay. So this is one of the housing units that
13	document this is?	13	has about 48 or 64 cells?
14	A It's a jail log.	14	A Yes.
15	Q And is this typical of the jail logs -- well,	15	Q And when you're asked to report to another
16	strike that.	16	housing unit because of an attempted suicide,
17	Does this look like how the jail	17	what is your role?
18	logs you created looked?	18	A Well, the main -- I mean, when you first respond,
19	A Yes.	19	is to make sure that all the other inmates are
20	Q So I'm going to direct you to page 992 at the	20	secured in their cells, which means checking the
21	bottom. It should say "MKE County 992."	21	doors. At that time of night, they should have
22	A Mm-hmm.	22	been in their cells, but you still check the
23	Q There is an entry close to the bottom of the page	23	doors.
24	with a user date/time of 3/10/14 -- or I'm	24	And then just provide -- stand by
25	sorry -- 3/9/14, 11:47 p.m. Do you see that?	25	until if a nurse asks you to go get something

		Page 50			Page 52
1	or -- it's usually just stand by unless they need		1	A	It's a restraint -- I'm not sure what it stands
2	help lifting a person or whatever.		2		for anymore. It's a restraint bed.
3	Q Now let's look at MKE County 996.		3	Q	Okay.
4	A Okay.		4	A	Setting it up means setting up the different
5	Q About three rows down there's an entry 3/9/14,		5		security straps.
6	10:51 p.m.?		6	Q	Were you ever stationed in the special needs
7	A Mm-hmm.		7		unit?
8	Q Is that your name in the log text?		8	A	Yes.
9	A Yes, it is.		9		MR. ARNOLD: Objection; asked and
10	Q It says you're in pod to assist with inspection		10		answered. Go ahead.
11	while CO Duerr sets up the RIPP bed in SNA 3.		11		THE WITNESS: Yes, I was.
12	A Yes.		12	BY MS. DAVIS:	
13	Q What pod is SPND?		13	Q	Thank you.
14	A That is the special needs unit.		14		MR. ARNOLD: You're asking special
15	Q What is the special needs unit?		15		needs now, not --
16	A That is for inmates who have severe mental health		16		MS. DAVIS: Yeah.
17	issues and are either off of their meds, not		17		MR. ARNOLD: Okay. -- not the SMU?
18	med-compliant, or aren't medicated and need to be		18		MS. DAVIS: It's not the SMU. It's the
19	medicated.		19		special medical unit.
20	Most of them are severely mentally		20		MR. ARNOLD: Gotcha.
21	ill in that unit.		21	BY MS. DAVIS:	
22	Q Are there -- sorry. To the best of your		22	Q	I'm sorry. Whenever you set up one of these
23	knowledge, is there any medical staff stationed		23		restraint beds, did you have to call in another
24	in the special needs unit?		24		CO to help with inspections?
25	MS. KUGLER: Objection; form.		25	A	Yes.
		Page 51			Page 53
1	MR. ARNOLD: Any time or all times?		1	Q	Why was that?
2	MS. DAVIS: At all times.		2	A	Well, on third shift there's -- when I was in
3	THE WITNESS: No.		3		there, it was one officer assigned to that unit
4	BY MS. DAVIS:		4		on third shift.
5	Q Okay. Are there -- is there nursing staff or		5		You can't be setting up a bed and
6	medical staff stationed either in or near the SMU		6		be able to keep an eye on the inmates.
7	at all times?		7	Q	Okay. And how many cells are in the special
8	MS. KUGLER: Objection; form.		8		needs unit? I can't remember if I asked you this
9	MR. ARNOLD: If you know.		9		or not.
10	THE WITNESS: Well, the nurses' offices		10	A	18.
11	and area are directly across from the SMU.		11	Q	So it's a smaller unit like the SMU?
12	Now, depending on staffing, if		12	A	Yes.
13	they're doing med rounds or what have you,		13	Q	Was there any training that you had to go through
14	physically there might not be anybody in there.		14		to work in the special needs unit?
15	BY MS. DAVIS:		15	A	Yes.
16	Q So, if you know, about how long would you		16	Q	Was that a one-time training or multiple
17	estimate that it would take to get from the		17		trainings?
18	clinic or the nursing and medical staff part to		18	A	Well, when I first started, I was trained --
19	the SMU?		19		because there were still deputies assigned to the
20	A A minute, 30 seconds.		20		jail, I was trained by a deputy who had worked in
21	Q And then, if you know, about how long would it		21		there multiple years on how to work in there, and
22	take to get from the clinic or the medical		22		then I took the additional crisis intervention
23	nursing staff part to the special needs unit?		23		training.
24	A 45 seconds to a minute. It's down the hallway.		24	Q	So the crisis intervention training was related
25	Q Okay. What does set up the RIPP bed mean?		25		to working in the special needs unit?

	Page 54	Page 55	Page 56
1 A	Well, not 100 percent. Crisis intervention is for any type of person that is having a crisis, be it a temporary mental health crisis or a permanent mental health crisis.		that third row where your name is, the start time is listed at 10:51 and the end time is listed at 10:52.
5	The Milwaukee Police Department uses CITs now on a regular basis. They work with police officers and respond to mental health crises or people in mental distress.		Are those times for how long it took to set up the bed?
9 Q	So when -- so when you say "crisis intervention," it's specifically mental health crisis?	6 A	No. That's -- the 10:51 and the 10:52, I'm -- it's when it started. Sometimes if you start entering it at 10:51 and when you hit enter it's 10:52 -- it doesn't say how long I was there.
11 A	I mean, it comes under the general heading, but it can be someone -- I mean, we responded to people that come in, they were arrested, and they're upset about being arrested. So they're having a temporary breakdown or crying fit or whatever.	10	He never said I left, I guess, is what this looks like.
17	And we were trained -- additional training on basically verbal communication to assist with getting them calmed down.	12 Q	So are those two times supposed to indicate when you arrived and when you left?
20 Q	Okay. What topics were covered in the training to work in the special needs unit?	14 A	No. He should have made -- he should have had a second entry that said I left. This just shows I arrived.
22 A	For the crisis intervention? See, now for my training in special needs, I did -- I learned a lot from the deputy who I worked with, but I also took it on myself to read materials on different	17 Q	And when it says that you assisted with inspections, does that mean you completed one of those rounds or that you were just there to observe while he set the bed up?
25		21 A	I don't recall. I mean, I don't even recall being in there on that specific day.
		23 Q	Let's talk about the incident report a little bit for the one you reviewed.
		25	MS. KUGLER: Can I interrupt you for a
1	mental health disorders and medications, etc., because I wanted to be a knowledgeable officer.	1	short break?
3 Q	And when you say that the deputy helped train you, was that the informal on-the-job training that you discussed a little bit earlier?	2	MS. DAVIS: Yes. Absolutely.
6 A	Yes.	3	(A recess was taken.)
7 Q	Was there any way to track that kind of training?	4	(Exhibit 4 was marked for identification.)
8	MS. KUGLER: Objection; form, foundation.	5	BY MS. DAVIS:
10	MS. DAVIS: I'll rephrase it because that was a poorly phrased question.	7 Q	Before we look at the incident report, I want to just go back and talk about the policies we looked at first, Exhibits 1 and 2.
12 BY MS. DAVIS:		10	At the top of both of those exhibits, on their first pages, there are revisions listed. Whenever a policy was updated, were you given a copy of it?
13 Q	When the deputy was assisting you with this on-site training, was there any policy that they went over and talked to you about?	12	MR. ARNOLD: Objection; foundation. If you know.
16 A	We went through and reviewed the policies and procedures that are in everybody -- that everybody has access to about that specific unit.	13	THE WITNESS: They made -- they being command staff -- made a point of usually handing them out at a roll call for everyone to look at or discuss.
19 Q	Okay. And was that a more in-depth training than you received in the academy?	14	BY MS. DAVIS:
21 A	Well, it's more one on one, plus you're with -- you've got inmates there that actually have mental health issues versus listening to a lecture.	21 Q	So when policies were updated, were you notified -- were you notified every time?
25 Q	All right. Actually, going back to page 986 on	22	A I can't recall.
		23 Q	And then in the instances that you can recall, were you always handed a copy of a policy?

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1	MR. ARNOLD: Same objection;	1 jail, how were you notified that that happened?
2	foundation. If you know.	2 MS. KUGLER: Objection; form,
3	THE WITNESS: I don't recall if we got	3 foundation.
4	a copy every time or not.	4 THE WITNESS: Well, it was a little bit
5	BY MS. DAVIS:	5 of news prior to them coming in, so I guess
6	Q Thinking back on the eight years that you worked	6 that's how we were informed.
7	at the jail, do you recall any instances where a	7 BY MS. DAVIS:
8	policy was updated and that you received a	8 Q While you were working at the Milwaukee County
9	subsequent training based on that update?	9 Jail, do you recall any roll call notification
10	MS. KUGLER: Objection; form.	10 about Armor Correctional --
11	THE WITNESS: I don't recall anything	11 A I don't recall, no.
12	specific.	12 Q Okay. I hand you what we marked as Exhibit 4. I
13	BY MS. DAVIS:	13 believe it's the same as the document you said
14	Q So is it fair to say that you never got a	14 that you reviewed.
15	training based on an updated policy while you	15 A Yep. Mm-hmm.
16	worked at the Milwaukee County Jail?	16 Q What is this document?
17	MR. ARNOLD: Objection; foundation.	17 A This would be an incident report.
18	She said she didn't remember.	18 Q Would this be considered a major incident report?
19	THE WITNESS: I don't remember.	19 A No.
20	MS. DAVIS: Could you read back the	20 Q What is a major incident report?
21	question, please.	21 A A major incident report, which rarely happens,
22	(Last question read.)	22 would be something where there was an assault on
23	BY MS. DAVIS:	officers or 20 inmates fighting.
24	Q To the best of your recollection, do you remember	24 It has to be major -- it has to be
25	any training that you got based on an updated	25 something major. This is a medical emergency.
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1	policy while you worked at the Milwaukee County	1 This is just a regular incident report.
2	Jail?	2 Q And are major incident reports written up by COs
3	A Not a specific policy, but I'm sure we had it,	3 as well?
4	because that's what roll call is used for.	4 A Major incident reports -- I can't even remember.
5	Q Roll calls were used for training?	5 It usually involves -- the lieutenant writes
6	A Well, that was part of roll call besides, you	6 that, but there are supplemental reports by all
7	know, the shift assignments.	7 the involved officers.
8	And then if there's a new policy,	8 The major incident report
9	they would have talked about it or they would	9 basically gives a synopsis of what happened, and
10	have talked about whatever.	10 then all the other documents go with it. But I
11	Q So when you say "training," do you just mean that	11 don't even remember anymore what's all involved
12	they talked about it or --	12 with that.
13	A Informal training versus classroom training.	13 Q So for an incident report like this one where
14	MS. KUGLER: Objection; form.	14 it's about a medical emergency, would there just
15	BY MS. DAVIS:	15 be one report written --
16	Q Was there ever any followup after the informal	16 A For this type of situation? Yes.
17	training?	17 Q Okay. So even though there are numerous COs
18	A Nothing formal.	18 listed as being on the scene, it would just be
19	Q Did you ever have to sign any documents that said	19 this one incident report generated?
20	that you understood that there was an update to a	20 A Yes.
21	policy?	21 Q At the bottom of the page marked "MKE County 11,"
22	A On occasion we did have to sign that we received	22 there are two boxes. One says, "Time Received"
23	it or read it or whatever, but I can't tell you	23 and "Time Cleared." What does that mean?
24	which ones we signed or didn't sign.	24 MR. ARNOLD: Objection; foundation. If
25	Q Okay. And then when Armor started working in the	25 you know.

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1	THE WITNESS: I don't know.	
2	BY MS. DAVIS:	
3	Q When you were a lieutenant, did you have to	1 A No.
4	review any incident reports?	2 Q Other than taking draft off of the form --
5	A Yes.	3 A It's a computer function.
6	Q Did you have to fill out this bottom section, or	4 Q So other than taking draft off of it, is there
7	was that filled out by the CO?	5 anything else that you could point to to show
8	A I believe the time received, time cleared is a	6 that it was approved?
9	computer function.	7 A No. You can't take draft off of it until you hit
10	Q So when would the computer generate these	8 the approved in the computer. You can't force it
11	timestamps?	9 to disappear.
12	MR. ARNOLD: Objection; foundation. If	10 Q So at the bottom on MKE County 11, the time
13	you know.	11 received and time cleared, you're saying those
14	THE WITNESS: I don't know.	12 were just generated by the computer?
15	BY MS. DAVIS:	13 A Right.
16	Q When you submit an incident report, do you have	14 Q And where it says, "Reviewed by Montano, CO
17	to log the time?	15 Crystalina," did Lieutenant Montano have to enter
18	MS. KUGLER: Objection; form.	16 her name herself, or is that something that CO
19	THE WITNESS: The computer -- you can	17 Wenzel would have entered, if you know?
20	submit logs at the time.	18 MR. ARNOLD: Objection; foundation.
21	BY MS. DAVIS:	19 MS. KUGLER: Join.
22	Q Do you know where on the form that would show up?	20 THE WITNESS: He would have submitted
23	A I don't know.	21 his report to her in the computer. She has to
24	Q Did you receive any training on how to generate	22 log in to the report program under her name.
25	one of these incident reports?	23 And normally, unless it's
		24 something -- she's the only one who can look --
		25 you know, who has direct access to it, but she
	Page 63	Page 65
1	A Yes.	1 wouldn't have typed that in. It would have been
2	Q Did they instruct you on how to enter the time on	2 generated by the report program.
3	the form?	3 BY MS. DAVIS:
4	MS. KUGLER: Objection; form.	4 Q So what parts of MKE County 11 would have been
5	THE WITNESS: The time should be	5 written by a person as opposed to generated by a
6	entered in the body of the thing. When you	6 computer, if you know?
7	enter -- the 5:23 is probably when he entered the	7 MR. ARNOLD: Objection; foundation.
8	information into the computer, but I can't say	8 MS. KUGLER: Join.
9	that with 100 percent surety.	9 BY MS. DAVIS:
10	In the body of his thing, in his	10 Q Let me rephrase it. Actually, let me take a step
11	report, it should say what time, what happened,	11 back.
12	etc. Sometimes they don't get to write the	12 When you were trained on filling
13	report until everything is over with because	13 out these reports, were you told what sections
14	they're not going to say, "Wait, I have to enter	14 you had to write in?
15	this to write the report."	15 A Yes. And the computer requires you to enter that
16	BY MS. DAVIS:	16 information or it won't proceed.
17	Q And as a lieutenant, when you reviewed these	17 Q What sections on MKE County 11 do you have to
18	incident reports, did you have to approve them?	18 fill in before the computer will proceed?
19	A Yes.	19 A Everything. I mean, he entered -- you know, he's
20	Q How was that marked on the incident report?	20 reporting the incident, he's reporting the time,
21	A Well, this must be approved because there's no --	21 the computer generates the report number, he's
22	until it's approved, it will say draft across the	22 putting in where it happened, he used the proper
23	copies.	23 code for a medical emergency.
24	Q And is there some kind of signature that needs to	24 And then when you do reporting
25	be added to show that it was approved?	25 officer, if you look on the back page, he's the

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1	reporting officer, and the supervisor is	1	A Yes.
2	Lieutenant Montano.	2	Q Do you remember if there was any blood that you
3	Q So what parts of MKE County 11 were generated by	3	saw there?
4	a computer?	4	A I don't recall that.
5	A He has to type this information in. He typed the	5	Q Okay. Did she -- well, I'll rephrase.
6	summary in.	6	Do you remember how Rebecca Terry
7	Q So the time received and time cleared, is that	7	was behaving at that time?
8	something that you were trained to enter yourself	8	MS. KUGLER: Objection; form.
9	or that the computer would generate?	9	THE WITNESS: I don't recall.
10	A The computer is going to ask you what time it	10	BY MS. DAVIS:
11	occurred or what time he's doing the report, and	11	Q Do you recall whether she was calm?
12	5:23 must have been when he was doing the report.	12	A She wasn't screaming and yelling. That I would
13	I was not there for when he did	13	say.
14	his report.	14	Q Do you recall whether the baby was crying?
15	Q Well, going to MKE County 12 -- MKE County 12	15	A I don't recall. I mean, I was three people back,
16	through 14, on the bottom it says, "Reporting	16	because the nurses -- they were all up front and
17	Officer ID No. and pages."	17	close. We were basically waiting for
18	Are those areas that would be	18	instruction.
19	generated by the computer? Do you know if those	19	Q Were you given any instructions while you were
20	are areas that would be generated by the	20	there?
21	computer?	21	A I don't recall anything specific.
22	MS. KUGLER: Objection; form.	22	Q Do you recall what you did after this incident
23	THE WITNESS: That would be -- once he	23	resolved itself -- or was resolved, I should say?
24	enters he's the reporting officer, it's going to	24	A I don't recall.
25	keep appearing for each page that's generated in	25	Q Okay. Was there any followup done about this
	Page 67		Page 69
1	the report.	1	incident?
2	BY MS. DAVIS:	2	MS. KUGLER: Objection; form.
3	Q Okay. Looking at the third paragraph down that	3	THE WITNESS: I don't recall
4	begins at 04:46 hours, is that your name at the	4	specifically.
5	end of the first line and to the second line?	5	BY MS. DAVIS:
6	A Yes, it is.	6	Q Did anyone at the jail speak with you about this
7	Q Do you recall reporting to the SMU the morning of	7	incident after it happened?
8	March 10, 2014?	8	A I don't recall.
9	A It says I was there, so I must have been there.	9	Q Did you talk to anybody about this incident after
10	Q Do you remember being there?	10	it happened?
11	A Vaguely. I mean, generally.	11	A I don't recall.
12	Q And when you reported -- do you remember where	12	Q Do you recall how long you were in the SMU that
13	you came from?	13	night?
14	A I don't remember. I don't know where I was	14	A I don't recall, but, I mean, based on the report,
15	assigned that day.	15	probably till about five o'clock.
16	Q And when you reported, did you come in with the	16	Q Do you recall any other times that a baby was
17	medical staff or did you just go there directly?	17	delivered in the Milwaukee County Jail?
18	A I most likely reported directly from wherever I	18	A I don't recall. I was not there for anything,
19	was coming from.	19	but I don't know for sure.
20	Q While you were in the SMU that morning, do you	20	Q When this -- scratch that.
21	remember any actions that you did specifically?	21	Earlier you said that other COs
22	A Nothing specific.	22	don't review report incidents. Let me rephrase
23	Q While you were there, did you see Rebecca Terry?	23	that. Did you review this report -- incident
24	A Yes.	24	report before it was submitted?
25	Q Do you recall seeing her and her baby?	25	A No.

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1	Q	Did you see it before you started preparing for this deposition?	1 available -- and I've seen where 20, 30 people show up, and if they're not needed, some of them are told, "You can go back to your posts."
2	A	Yes.	2
3	Q	When?	3
4	A	When I received a copy from this gentleman.	4 Q Okay. Do other supervisors respond?
5	Q	Okay. But outside of any preparation for the deposition, did you ever look at this report?	5 A If they're available. Again, on third shift it's a much smaller staff, so hopefully -- I mean, if you're available, you respond; if they're not available, they don't respond.
6	A	No.	6
7	Q	Did CO Wenzel ever talk to you about the incident?	7
8	A	Not that I recall. I mean, he -- not that I recall anything specific.	8
9	Q	Okay. On MKE 2014 --	9 Unless they're specifically called, we need additional supervisors, additional whatever.
10		MS. KUGLER: Sorry. What did you say?	10
11		MS. DAVIS: MKE County 2014.	11
12		THE WITNESS: Okay.	12 Q And so would you find out a medical emergency over the radio?
13		BY MS. DAVIS:	13
14	Q	-- it lists that there was an -- assisting correctional officer, six.	14 A Correct.
15	A	Yes.	15 Q When you found out about it, is there any description of what's happening, or do you just hear that it's a medical emergency?
16	Q	In your experience, was it common for there to be six assisting correctional officers for a medical emergency?	16 A It depends on the -- most officers try to say something like -- and I don't know what he would have said -- you know, "Medical emergency: Inmate appears to be in labor," or "Medical emergency: Inmate complaining of severe abdominal pain; Medical emergency: Inmate appears to be self-harming."
17		MR. ARNOLD: Objection; foundation.	17
18		THE WITNESS: When a medical emergency	18 They don't want to say too much
		Page 71	Page 73
1		is called over the radio, any available officer responds. If there's only three, three respond; if there's six, six respond.	1 because of HIPAA.
2		And on third shift, there's going to be a lot less officers than on first or second.	2 Q Do you remember what was said over the radio that day?
3		BY MS. DAVIS:	3
4	Q	So any correctional officer who is not busy would report for -- or assist with a medical emergency?	4 A I absolutely don't recall.
5	A	Correct?	5 Q Did you stay in the SMU until Miss Terry was taken out via ambulance?
6	Q	Is there any chance that someone wouldn't respond to a medical emergency call?	6
7		MS. KUGLER: Objection; foundation.	7 A I don't recall.
8		MR. ARNOLD: Join.	8 Q Outside of reviewing this document, do you recall anything about Miss Terry giving birth in the SMU on March 10th, 2014?
9		BY MS. DAVIS:	9
10	Q	Can you recall any instance where someone would not respond to an emergency medical call?	10 A No. I wasn't there for the actual birth, so I don't know.
11	A	Unless they're occupied with something else -- if they're in the booking room, they're not going to respond because they're probably booking an inmate in.	11 Q Do you remember anything about reporting to assist until you looked at this incident report?
12	Q	So just hypothetically, if there were ten officers who were not busy, ten people could show up?	12
13	A	Ten people would respond. If 20 were	13 MS. KUGLER: Objection; form.
14			14 THE WITNESS: No.
15			15 BY MS. DAVIS:
16	Q		16 Q Did you have any independent recollection about the morning of March 10th, 2014, before this deposition was scheduled?
17	A		17 A No.
18	Q		18 Q Going back to when you were talking about Terrill Thomas and -- let me get it right this time -- the inquest about Terrill Thomas, do you know if other correctional officers were asked to testify
19			19
20			20
21			21
22			22
23			23
24			24
25			25

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1	about that?	1 STATE OF WISCONSIN )
2 A	Yes.	2 ) SS: 3 MILWAUKEE COUNTY )
3 Q	Do you know how many other officers?	4 I, Sandra K. Nelson, RPR and Notary 5 Public in and for the State of Wisconsin, do 6 hereby certify that the preceding deposition was 7 recorded by me and reduced to writing under my personal direction.
4 A	I don't know the exact number, no.	8 I further certify that said deposition 9 was taken at LEIB KNOTT GAYNOR, 219 North 10 Milwaukee Street, Milwaukee, Wisconsin, 53202, on 11 the 16th day of April, 2018 commencing at 12 10:02 a.m.
5 Q	Do you recall any other inquests being done about 6 inmates either having medical emergencies or 7 dying while in the jail?	13 I further certify that I am not a 14 relative or employee or attorney or counsel of 15 any of the parties, or a relative or employee of 16 such attorney or counsel, or financially 17 interested, directly or indirectly, in this 18 action.
8	MS. KUGLER: Objection; form.	19 In witness whereof, I have hereunto set 20 my hand and affixed my seal of office on this 5th 21 day of June, 2018.
9	THE WITNESS: I don't recall.	22
10 BY MS. DAVIS:		23
11 Q	Do you recall any other deaths happening in the 12 jail while you were a CO or a lieutenant?	24 SANDRA K. NELSON, RPR Notary Public
13 A	Yes, but I couldn't tell you names or when.	25 My commission expires December 28, 2018.
14 Q	Do you recall other deaths happening in the jail 15 while Armor Correctional Health had a contract 16 with the Milwaukee County Jail?	
17 A	That I don't recall.	
18 Q	Are there inquests done outside of an inmate 19 death?	
20	MR. ARNOLD: Objection; foundation. If 21 you know.	
22	MS. KUGLER: Join.	
23 BY MS. DAVIS:		
24 Q	I'll rephrase the question.	
25	In your experience do you know of	
	Page 75	
1	any other inquests that were done when an inmate 2 death was not involved?	
3 A	I have no -- no, I don't have any knowledge or 4 recollection.	
5 Q	Okay. Why were you asked to testify during the 6 inquest?	
7	MS. KUGLER: Objection; foundation.	
8	MR. ARNOLD: If you know.	
9	THE WITNESS: Probably because I was a 10 lieutenant. I mean, they literally asked me my 11 name, my position, and do I work at the Milwaukee 12 County Jail.	
13	And did I have any involvement 14 with that? Absolutely not. I wasn't even -- I 15 don't think I was working those days that that 16 occurred. I was scheduled off.	
17	MS. DAVIS: Okay. I think that's all 18 that I have.	
19	MS. KUGLER: No questions.	
20	MR. ARNOLD: You are done. Thank you 21 very much.	
22	(Deposition concluded at 11:44 a.m.)	
23	(Original exhibits attached to original 24 transcript. Copies of exhibits attached to 25 copies of transcripts.)	

<b>0</b>	<b>3</b>	<b>996</b> 50:3  <b>A</b>  a.m. 13:20 75:22 <b>abdominal</b> 72:23 <b>absolutely</b> 10:23 18:16 37:18 57:2 73:4 75:14 <b>academy</b> 9:20,22 12:4,9,12,15 18:13 19:7,11,21 20:7,18 23:22 24:4,12 39:24 40:1,3 45:23 46:15 55:20 <b>access</b> 19:7 20:4 26:8,9 55:18 64:25 <b>accurately</b> 5:7 <b>acronym</b> 6:1 <b>actions</b> 67:21 <b>actual</b> 73:11 <b>added</b> 63:25 <b>additional</b> 17:14 33:5 34:23 40:6 53:22 54:17 72:10, 11 <b>address</b> 12:3 <b>admission</b> 27:3,6 30:19 <b>advanced</b> 33:22 <b>agree</b> 5:5 <b>ahead</b> 45:19 52:10 <b>alarms</b> 26:3 <b>alert</b> 32:6 <b>alive</b> 37:11 38:10 <b>Alliance</b> 13:9 16:1 <b>ambulance</b> 73:6 <b>annual</b> 24:9 <b>answers</b> 5:9 <b>anymore</b> 52:2 61:11 <b>appeared</b> 38:23	<b>appearing</b> 66:25 <b>appears</b> 72:21,24 <b>application</b> 9:10,12 <b>apply</b> 9:7,13 <b>appointments</b> 33:24 34:1,2 <b>approve</b> 63:18 <b>approved</b> 20:12,14, 24 63:21,22,25 64:6, 8 <b>area</b> 10:24 14:22 19:9 25:12 26:18 51:11 <b>areas</b> 17:7,18 66:18, 20 <b>Armor</b> 13:21 14:2, 18 16:4,20 59:25 60:10 74:15 <b>ARNOLD</b> 6:19,21 14:4,13 19:12 20:15 21:8 23:2 27:18,23 28:5,17,25 29:9 30:21 31:5,22 34:25 35:21 37:15 38:5 39:5,19 40:9,16 41:14 42:25 43:15, 21 45:5,18 46:8,19 47:5 48:7,21 51:1,9 52:9,14,17,20 57:14 58:1,17 61:24 62:12 64:18 65:7 70:24 71:14 74:20 75:8,20 <b>arrested</b> 54:13,14 <b>arrived</b> 56:13,16 <b>asks</b> 49:25 <b>asleep</b> 38:3,8,16 <b>assault</b> 60:22 <b>assigned</b> 22:14 53:3,19 67:15 <b>assignment</b> 17:10 <b>assignments</b> 59:7 <b>assist</b> 33:13 50:10 54:19 71:9 73:14 <b>assisted</b> 56:17  <b>B</b>  <b>baby</b> 67:25 68:14 69:16 <b>Bachelor's</b> 8:15 <b>back</b> 8:8 20:24 24:3 31:11 40:1 49:6 55:25 57:8 58:6,20 65:11,25 68:15 72:3 73:22 <b>background</b> 8:4 <b>bag</b> 33:14 <b>base</b> 39:1,2,15 <b>based</b> 18:9 27:2 29:14 34:18 39:6 58:9,15,25 69:14 <b>basically</b> 33:15 54:18 61:9 68:17 <b>basis</b> 54:6 <b>bed</b> 50:11 51:25 52:2 53:5 56:5,20 <b>beds</b> 52:23 <b>began</b> 13:22 44:4 <b>begins</b> 67:4 <b>behaving</b> 68:7 <b>bigger</b> 40:21 <b>biohazard</b> 26:16,22
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